

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HAO ZHE WANG,

Plaintiff,

vs.

VERIZON COMMUNICATIONS INC., et al.

Defendants.

Case No.: 1:19-CV-09506-JMF

**DECLARATION OF RAY-KELLE
PRESTON REGARDING STATUS OF
DEFENDANTS NAMED IN PLAINTIFF
HAO ZHE WANG'S AMENDED
COMPLAINT**

Hon. Judge Jesse M. Furman

Compl. Filed: October 15, 2019

I, Ray-Kelle Preston, hereby declare as follows:

1. I am over the age of 18 and am competent to testify to the facts declared below, and could testify truthfully thereto if required. I am currently employed by Verizon Corporate Resources Group LLC as a Senior Analyst and Custodian of Record. I have held this position since 2019. In my capacity as a Senior Analyst and Custodian of Record, I provide services to and on behalf of Verizon New England Inc. ("VNE") and various other "Verizon" entities, particularly in relation to the handling of consumer disputes for Verizon, among other things.
2. In preparing this Declaration, I have relied on my personal knowledge of, and experience in, the business operations of VNE, as well as a review of VNE's business records. VNE's business records are made in the regular course of business, at or near the time of the acts, conditions or events described in the documents, and by or from information provided by a person with knowledge of the act, conditions or events. I have reviewed the list of defendants named by Plaintiff in the First Amended Complaint ("FAC"), and have reviewed the records for the VNE wireline service account referenced in the FAC (the "Subject Account").
3. The Subject Account was exclusively established, owned, operated, and managed by VNE.

4. VNE is a regulated public utility which provides telecommunications services to residential and business customers in the State of Massachusetts.

5. None of the remaining defendant entities identified by Plaintiff in the Amended Complaint [Dkt. No. 78] established, owned, operated, or managed the Subject Account.

6. The following entities do not exist, and did not establish, own, operate, or manage the Subject Account:

- i. **“Verizon Media LLC”** has never existed;
- ii. **“Verizon Wireless Business Services, LLC”** has never existed;
- iii. **Verizon Wireless (VAW) LLC** ceased to exist upon merger with Cellco Partnership on or about December 31, 2019;
- iv. **Verizon Teleproducts Corp.** ceased to exist upon merger with Verizon Connected Solutions in 2019; and
- v. **Verizon Services Operations Inc.** ceased to exist upon merger with Verizon Connected Solutions in October 2014.

7. The following entities exist, but did not establish, own, operate, or manage the Subject Account.

- i. **Verizon Communications Inc.;**
- ii. **Verizon Long Distance LLC;**
- iii. **Verizon Services Corp.;**
- iv. **Verizon Wireless Services, LLC;**
- v. **Verizon Business Network Services Inc.;**
- vi. **Verizon Capital Corp.;**
- vii. **Verizon Connected Solutions Inc.;**
- viii. **Verizon Corporate Resources Group LLC;**
- ix. **Verizon Corporate Services Group Inc.;**
- x. **Verizon Federal Inc.;**
- xi. **Verizon Sourcing LLC;**
- xii. **Verizon Services Organization Inc.¹;**

- xiii. **Verizon Business Purchasing LLC;**
- xiv. **Verizon Turnkey Services LLC;**
- xv. **Verizon Select Services Inc.;**
- xvi. **Verizon Online LLC;**
- xvii. **Verizon Connect Inc.;**
- xviii. **Verizon Connect NWF Inc.;**
- xix. **Verizon Credit Inc.;**
- xx. **Verizon Digital Media Services Inc.;**
- xxi. **Verizon Information Technologies LLC; and**
- xxii. **Verizon New York Inc.**

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on March 6, 2020 at Piscataway, New Jersey


Ray-Kelle Preston

¹On the page captioned "Attachment to Complaint" (ECF No. 78 at p. 8), Plaintiff identifies "Verizon Services Organization Inc.," but on a later page (ECF No. 78 at p. 10), Plaintiff instead identifies "Verizon Services Operations Inc." for Defendant No. 16. These were in fact two separate entities until Verizon Services Operations Inc. ceased to exist by merger in October 2014.